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21 [Additional Counsel Listed on Signature Page]

22 UNITED STATES DISTRICT COURT
23 DISTRICT OF NEVADA

24 In re ALLIED NEVADA GOLD CORP.
25 SECURITIES LITIGATION

) Case No. 3:14-cv-00175-LRH-WGC

) CLASS ACTION

26 This Document Relates To:

27 ALL ACTIONS.

) LEAD PLAINTIFF'S MOTION FOR
) FINAL APPROVAL OF CLASS NOTICE,
) FINAL APPROVAL OF THE PROPOSED
) SETTLEMENT, FINAL APPROVAL OF
) THE PROPOSED PLAN OF
) ALLOCATION, AND LEAD COUNSEL'S
) MOTION FOR AN AWARD OF
) ATTORNEYS' FEES AND
) REIMBURSEMENT OF LITIGATION
) EXPENSES AND LEAD PLAINTIFF'S
) REQUEST FOR REIMBURSEMENT FOR
) HIS TIME AND EXPENSERS
) REPRESENTING THE CLASS

1 Court-appointed Lead Plaintiff Andrey Slomnitsky (“Lead Plaintiff”) and Lead Counsel,
2 Brower Piven, A Professional Corporation (“Lead Counsel”) respectfully will move this Court for
3 entry of the Final Judgment and Order of Dismissal With Prejudice in the form annexed as Exhibit B to
4 the Stipulation and Agreement of Settlement, dated January 24, 2020 (the “Stipulation,” ECF No. 199):

5 1. Finding that the forms and methods for providing notice to the Class (the “Notice”),
6 issued pursuant to this Court’s June 10, 2020 Order Granting Preliminary Approval of Proposed
7 Settlement, Granting Conditional Class Certification, and Providing for Notice to the Class
8 (“Preliminary Approval Order”; ECF No. 201), met the requirements of FED. R. CIV. P. 23(c) and (e),
9 the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u–4 *et seq.*, and due process;

10 2. Granting final certification for settlement purposes, pursuant to Fed. R. Civ. P. 23(a)
11 and 23(b)(3), to the class consisting of all persons and entities who purchased Allied Nevada Gold
12 Corporation (“Allied”) common stock in the United States or on a securities exchange in the United
13 States between January 18, 2013 through August 5, 2013, inclusive (the “Class”;

14 3. granting final approval, pursuant to FED. R. CIV. P. 23(e), of the Settlement on the terms
15 set forth in the Stipulation.

16 4. granting approval of the plan of allocation of the proceeds of the Settlement;

17 5. awarding Plaintiff’s Counsel, pursuant to FED. R. CIV. P. 23(h) and FED. R. CIV. P.
18 54(d)(2), attorneys’ fees equal to 33 1/3% of the Settlement Fund for their efforts in prosecuting the
19 Action and obtaining the Settlement;

20 6. awarding Lead Counsel reimbursement of litigation and administration expenses in the
21 amount of \$324,557.52.

22 7. awarding Lead Plaintiff \$10,000 as reimbursement for his time and expenses expended
23 in representing the Class; and

24 8. granting such other and further relief as the Court may deem just and proper.

25 As grounds and in support of the above requested relief, Lead Plaintiff respectfully refers the
26 Court to the accompanying: (a) Lead Plaintiff’s Memorandum of Law in Support of Motion for Final
27 Certification of the Class and Final Approval Class Notice; (b) Plaintiff’s Memorandum in Support of
28 Final Approval of the Proposed Settlement and Approval of the Proposed Plan of Allocation; (c) Lead

1 Plaintiff's and Plaintiff's Counsel's Memorandum in Support of (1) Plaintiff's Counsel's Application
 2 for an Award of Attorneys' Fees; (2) Plaintiff's Counsel's Request For Reimbursement of Their
 3 Litigation Expenses; and (3) Lead Plaintiff's Request For Reimbursement For His Time and Expenses
 4 Representing the Class; (4) the Declaration of David A.P. Brower in Support of Lead Plaintiff's
 5 Motion for Certification of the Class for Settlement Purposes, Final Approval of the Settlement,
 6 Approval of the Plan of Allocation, and Lead Plaintiff's Counsel's Motion for an Award of Attorneys'
 7 Fees and Reimbursement of Expenses and Lead Plaintiff's Request For Reimbursement For His Time
 8 and Expenses Representing the Class, dated August 24, 2020, and the exhibits thereto; and (e) other
 9 such matters and arguments as the Court may consider with respect to this Motion.

10 The form of the [Proposed] Final Judgment and Order of Dismissal ("Proposed Final
 11 Judgment") was submitted to the Court on February 10, 2020 as Exhibit B to the Stipulation. *See* ECF
 12 No. 199. Certain information necessary to finalize the Proposed Final Judgment, such as the number
 13 of requests for exclusion from the Class, if any, and disposition of any objections received, if any, is
 14 not yet available, and will only be available following the September 28, 2020 deadline for requests for
 15 exclusion or objections. Accordingly, Lead Plaintiff will provide the Proposed Final Judgment in final
 16 form with their supplemental papers that will be filed, pursuant to the Court's Preliminary Approval
 17 Order, ten (10) business days prior to the Settlement Hearing.

18
 19 DATED: August 24, 2020

Respectfully submitted,

20 **MUCKLEROY LUNT, LLC**

21 /s/ Martin A. Muckleroy

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Additional Counsel for Lead Plaintiff and the Class

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed on August 24, 2020, and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Martin A. Muckleroy

Martin A. Muckleroy